

EC-2000-007
IV-D-125

February 27, 2002

U.S. Environmental Protection Agency
Enforcement and Compliance Docket and
Information Center (Mail Code 2201A)
Attention: Docket Number EC-2000-007
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Establishment of Electronic Reporting; Electronic Records Rule
66 Fed. Reg. 46162 (August 31, 2001)

Dear Sir/Madam:

TXU Business Services Company submits the following comments on behalf of the subsidiaries of TXU Corp (hereinafter referred to as TXU) concerning the Environmental Protection Agency's (EPA) above-referenced proposed rule, which EPA also refers to as the Cross-Media Electronic Reporting and Recordkeeping Rule (CROMERRR). TXU is a member of the Edison Electric Institute (EEI) and fully supports their comments provided under separate cover.

TXU encourages EPA to withdraw at least recordkeeping provisions of the proposed rule since they were based upon the incorrect assumption that regulated entities were not already maintaining records electronically to a significant extent. The expense of converting existing recordkeeping systems in the manner proposed by this rule would be much higher than that estimated by EPA.

Thank you for extending the comment period for this proposed rule and for providing additional public meetings during the extended comment period.

If you have any questions regarding these comments, please contact Mr. David P. Duncan at 214-812-9479.

Sincerely,

William E. Driscoll
Vice President, Environment, Health and Safety

